

Exhibit 27

DECLARATION OF KATHERINE RUBIN

KATHERINE RUBIN, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of the City of Philadelphia, Pennsylvania.
2. I voted in the 2016 general election in my district: Ward 5, Division1.
3. I have a master's degree and am a self-employed financial advisor.
4. I submit this declaration to explain the problems I and my fellow organizers

encountered in Philadelphia with efforts to request a recount of votes in the City. As I understand it, there are 1686 Divisions in the City and at least three (3) voters from each Division must request a recount in order for the votes in a Division to be recounted. This means that nearly 6,000 individual petitions would need to be filed with the Board of Elections within a very short time frame to obtain a City-wide recount.

5. Since Thanksgiving, I have volunteered my time to help request a recount of votes in the City of Philadelphia. As a volunteer, I organized other volunteers throughout the City to:

a) provide information to voters about how to request a recount; b) answer questions from voters about how to file a request for a recount; c) provide sample affidavits to voters to use to request a recount; and d) connect voters by Ward and Division so they could submit at least three petitions from each Division requesting a recount.

6. I also helped to organize volunteers to go to City Hall on November 28 to assist with matching voters by Division to meet the requirement that a minimum of three voters per Division make each recount request. These volunteers also researched Ward and Division numbers for voters to ensure that the correct information was provided in affidavits.

7. On Monday, November 28, 2016, I spent approximately three hours at City Hall directly assisting voters with petitions and I volunteered my time from home on the phone and by email to provide assistance the weekend before, on November 28 and during the rest of that week. I also coordinated communications with other organizers and provided updates to them and individual voters throughout the process.

8. Based on my personal observations and working with volunteers throughout this process I became very concerned that voters were being denied a meaningful opportunity to request a recount. First, because of the very short time provided to assemble three voters per Division and provide fully completed and notarized affidavits to the Board of Elections, it was extremely difficult, if not impossible, to identify the minimum number of voters needed for 1686 Divisions. Additionally, voters caring for children at home or caring for elderly or disabled family members did not have an adequate opportunity to make arrangements for a substitute care giver so they could go to a notary and then go to the Board of Elections. It was difficult over the Thanksgiving holiday weekend for voters to find notaries and to take time off from work on Monday November 28 to go to a notary and then to the Board of Elections.

9. Second, it was difficult for voters to obtain accurate and complete information on the recount process and thus, extremely difficult for voters to comply with recount requirements that were never fully disclosed. For example, it was difficult for voters to even find the office of the Board of Elections. The building has no sign on the side located on the same street as the building address, the building entrance is on a different street than the building address, and the building, which looks like a warehouse, is at an intersection where the street name changes from one name to another. None of this information is made generally available to the voter. Consequently, volunteers worked many hours to let voters know they could come to City Hall on

November 28 to request a recount. Given the short amount of time and limited resources, we were unable to reach voters in all Divisions.

10. Third, other than efforts by volunteers like myself, there was no mechanism in place for voters to identify other voters in their Division with whom to assemble three affidavits. Some polling places included more than one Division and some Division lines are confusing – just because you have a neighbor that lives across the street from you or a block away or voted at your polling place, does not mean that person is in the same Division as you. This confusion led to many mismatches of affidavits throughout the petition process on November 28 and 29. Based on reports to me from the volunteers I work with who kept a spreadsheet tracking this information, I believe there were at least 97 Divisions in which only one or two voters presented completed affidavits requesting a recount and thus, did not meet the required minimum of three voters.

11. Fourth, the process for filing an affidavit requesting a recount was so onerous that it excluded many voters including those without access to a printer, without access to the Internet, and without knowledge of how to find and use a notary.

12. In Philadelphia, the voters were failed by a system that imposed opaque and onerous requirements, the opposite of what the Democratic process should be. As a resident and voter in the City of Philadelphia, I was failed by the very laws that should protect the integrity of my vote and that of my fellow citizens.

Dated: December 4, 2016
Philadelphia, Pennsylvania


KATHERINE RUBIN